

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LIBERTY MUTUAL INSURANCE COMPANY	:	
	:	
Plaintiff,	:	
	:	CIVIL ACTION NO. 02-CV-2883
v.	:	
	:	
COUNTY OF DELAWARE, PENNSYLVANIA,	:	
COUNTY COUNCIL OF THE COUNTY OF	:	
DELAWARE, PENNSYLVANIA, and	:	
DELAWARE COUNTY DEPARTMENT OF	:	
PUBLIC WORKS.	:	JURY TRIAL DEMANDED
	:	
Defendants.	:	
	:	

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**ANSWER TO COUNTERCLAIM**

Plaintiff Liberty Mutual Insurance Company ("Liberty"), by and through its undersigned counsel, Bazelon Less & Feldman, P.C., hereby files its Answer to Counterclaim, and in support thereof, avers as follows:

72. After reasonable investigation, Plaintiff Liberty Mutual Insurance Company is without sufficient knowledge or information to form a belief as to the truth of the allegations of Defendants' paragraph 72; therefore the same are denied pursuant to Rule of Court.

WHEREFORE, Plaintiff Liberty Mutual Insurance Company hereby demands judgment in its favor and against the County of Delaware, Pennsylvania, the County Council of the County

of Delaware, Pennsylvania, and the Delaware County of Public Works in the amount of \$196,410.95, plus interest and such further relief as the Court deems necessary.

BAZELON LESS & FELDMAN

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August 13, 2002

J:\Liberty Bond & Mutual, 3536\Fair Acres, 00011\Pleading\Answer to Counterclaim.wpd